

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
SOUTHWESTERN DIVISION

| | | |
|--------------------------|---|-------------------------------------|
| UNITED STATES OF AMERICA |) | <u>INDICTMENT</u> |
| |) | |
| |) | Case No. _____ |
| v. |) | |
| |) | Violation: 18 U.S.C. §§ 1591(a)(1), |
| |) | 1594(a), 1594(d), and 1594(e)(1) |
| ZACHARY WOLFF |) | |

Attempted Sex Trafficking of a Child

The Grand Jury Charges:

On or about November 23, 2013, in the District of North Dakota,

ZACHARY WOLFF

knowingly attempted to recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate or foreign commerce, a minor female, whom he believed to be 16 years of age, knowing and in reckless disregard of the fact that the female minor had not attained the age of 18 years and that the female minor would be caused to engage in a commercial sex act;

All in violation of Title 18, United States Code, Sections 1591(a)(1) and 1594(a).

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of violating Title 18, United States Code, Sections 1591(a)(1) and 1594(a), as charged in this Indictment,

ZACHARY WOLFF

shall forfeit to the United States any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense; and, any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly as a result of the offense, namely:

- One Apple iPhone cellular phone, no serial number visible
- United States Currency in the amount of \$200

By virtue of commission of one or more of the felony offenses as charged in this Indictment, all right, title, and interest in the above-described property is vested in the United States and is hereby forfeited to the United States, pursuant to Title 18, United States Code, Section 1594(d) and 1594(e)(1).

A TRUE BILL:

/s/ Grand Jury Foreperson
Grand Jury Foreperson

/s/ Timothy Q. Purdon
TIMOTHY Q. PURDON
United States Attorney

GLD:aap